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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

IN RE NATIONAL SECURITY AGENCY TELECOMMUNICATIONS RECORDS LITIGATION This Document Solely Relates To: *Al-Haramain Islamic Foundation et al. v. Obama, et al.* (07-CV-109-VRW)	No. M:06-CV-01791-VRW **STIPULATION TO EXTEND RESPONSE DATE IN ORDER OF APRIL 17, 2009 [DKT. 84] AND PROPOSED ORDER** [Civil L.R. 6-1(b); 6-2; 7-12] Courtroom: 6, 17th Floor Judge: Hon. Vaughn R. Walker

Pursuant to Local Rule 6.1(b), the parties, through their undersigned counsel, hereby stipulate to an extension of the response date set forth in the Court's Order of April 17, 2009 (Dkt. 84 in 07-cv-109-VRW) from May 8, 2009 to May 15, 2009.

RECITALS

1. On April 17, 2009, the Court issued an order directing the parties to meet and confer regarding the entry of an appropriate protective order in this action concerning classified

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information and to either submit a stipulated order by May 8, 2009, or, if the parties are unable to agree on all terms, to jointly submit a document containing all agreed terms together with a document setting forth the terms about which they are unable to reach agreement and the respective positions of the parties with regard to each such term. *See* Order, April 17, 2009 (Dkt. 84 in 07-cv-109-VRW).

2. Plaintiffs forwarded their proposed draft protective order to the Government Defendants on April 24, 2009.

3. The Government Defendants require additional time to complete internal deliberations on its position in response to the Court's Order, confer with the plaintiffs regarding the Government's position, and prepare the Government's response under the Order.

4. In addition, the undersigned counsel for the Government (Mr. Coppolino) is currently scheduled to be before the Court in San Francisco on May 7, 2009, for a hearing on a separate matter in this MDL proceeding (the Government's motion for summary judgement in actions concerning various state government investigations, *see* Dkt. 536 (Government's motion) and Dkt. 574 (setting hearing for May 7, 2009) in MDL 06-cv-1791-VRW).

5. No prior modifications of the response date in the Court's April 17 Order have been sought or entered. L.R. 6-2(a)(2).

6. The requested time modification would have no other impact on the schedule of this case. L.R. 6-2(a)(3).

STIPULATION

Pursuant to L.R. 6.1(b), the parties, through their undersigned counsel, hereby stipulate and agree to a one-week extension of the response date set by the Court in its April 17 Order from May 8, 2009 to May 15, 2009.

DATED: April 30, 2009

Respectfully Submitted,

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By: *s/ Anthony J. Coppolino*
Anthony J. Coppolino

Attorneys for the Government Defendants

DECLARATION PURSUANT TO GENERAL ORDER 45, § X.B

I, ANTHONY J. COPPOLINO, hereby declare that, pursuant to General Order 45, § X.B, I have obtained the concurrence in the filing of this document from the other signatory listed below.

I declare under penalty of perjury that the foregoing declaration is true and correct.

Executed on April 30, 2009, in the City of Washington, District of Columbia.

s/ Anthony J. Coppolino
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SIGNATORY PER G.O. 45:

By: *s/ Steven Goldberg* per G.O. 45
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[PROPOSED] ORDER

Pursuant to the foregoing Stipulation, and good cause appearing, the Court hereby orders that the response date set forth in the Court's Order of April 17, 2009 [Dkt. 84] shall be and hereby is extended to May 15, 2009.

PURSUANT TO STIPULATION, IT IS SO ORDERED:

Dated: __________ ___, 2009

____
Hon. Vaughn R. Walker
United States District Chief Judge